

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

REC'D
NOV 15 2007
RESP

TO: Facility Name: Tri Rinse, Inc.
Address: 1402 S. 2nd St.
St. Louis, MO 63104-4424
EPA ID Number: MOR000505958 Date: 11/8/07

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation

Description of Violation

<u>40 CFR 265.16(d)(2)</u>	<u>No written job descriptions for positions</u>
<u>10 CSR 25-5.262(1)</u>	<u>related to hazardous waste management.</u>
<u>40 CFR 265.16(d)(3)</u>	<u>No written description of hazardous waste</u>
<u>10 CSR 25-5.262(1)</u>	<u>management training.</u>
<u>40 CFR 265.34</u>	<u>Inadequate access to an alarm or emergency</u>
<u>10 CSR 25-5.262(1)</u>	<u>communication device at the hazardous waste</u>
	<u>container storage area.</u>
<u>40 CFR 265.35</u>	<u>Inadequate aisle space around hazardous waste</u>
<u>10 CSR 25-5.262(1)</u>	<u>containers in the storage area.</u>
<u>40 CFR 265.52(d)</u>	<u>Contingency plan does not include the addresses</u>
<u>10 CSR 25-5.262(1)</u>	<u>of the emergency coordinators.</u>
<u>40 CFR 265.52(e)</u>	<u>Contingency plan does not include the location and</u>
<u>10 CSR 25-5.262(1)</u>	<u>physical description and capabilities of emergency equipment.</u>

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII

David N. Whiting
922 Walnut St.
Iowa City, IA 52240
ATTN: _____

If you have any questions about this Notice or wish to discuss your response, you may call me at
(319) 887-2618, or Jim Aycock (Compliance Officer) at
(913) 551-7887.

This Notice prepared by David N. Whiting Date: 11/8/07

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Chlon Shacklee Date: 11-8-07
Signature: Chlon Shacklee
Title: EHSI

465941



RCRA RECORDS

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Tri Rinse, Inc.
Address: 1402 S. 2nd St.
St. Louis, MO 63104-4424
EPA ID Number: MDR 000505958 Date: 11/8/7

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation

Description of Violation

<u>RR 0582 Certification</u> <u>Approval item No. 5</u>	<u>One of four processing work orders</u> <u>did not include the date of processing.</u>
<u>465941</u>	<u>AI</u>

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII

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922 Walnut St.
Iowa City, IA 52240
ATTN: _____

If you have any questions about this Notice or wish to discuss your response, you may call me at
(319) 887-2618, or Jim Aycock (Compliance Officer) at
(913) 557-7007.

This Notice prepared by David N. Whiting Date: 11/8/07

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Clinton Shocklee Date: 11-8-07
Signature: [Signature]
Title: EHSI



Specialists in Environmental Services

RECEIVED

NOV 21 2007

ARCM/ENSV
EFCB

November 20, 2007

U.S. Environmental Protection Agency
David M. Whiting
922 Walnut St.
Iowa City, IA 52240

REC'D
NOV 26 2007
RESP

David,

This letter is a formal response by Tri-Rinse Inc. listing the corrective actions taken pursuant to requirements of the Resource Conservation and Recovery Act (RCRA). Attached is the Emergency Hazardous Waste Management Plan, different from the Emergency Management Plan submitted during your site visit on November 8, 2007. This plan is specific to our Resource Recovery Permit and in compliance with the Requirements of the Resource Conservation and Recovery Act.

Citation: 40 CFR 265.16 (d)(2); 10 CSR 25-5.262(1)

Description: No written job descriptions for positions related to hazardous waste management.

Corrective Action: Section 4.0 of the Emergency Waste Management Plan has job descriptions for the individuals related to hazardous waste management. Furthermore, Tri-Rinse is conducting Job Safety Analysis for each operating position in the plant, including hazardous waste managers. This will be completed by January 31, 2008.

Citation: 40 CFR 265.16 (d)(3); 10 CSR 25-5.262 (1)

Description: No Written Description of Hazardous Waste Management Training.

Corrective Action: Hazardous waste management training will be conducted annually with any employee that encounters hazardous waste. The training will be a review and test of the emergency hazardous waste management plan. This plan will be reviewed twice a year to ensure that any necessary changes can be made. This training will be documented and kept with the EHSD.

Citation: 40 CFR 265.34; 10 CSR 25-5.262 (1)

Description: Inadequate access to an alarm or emergency communication device at the hazardous waste container storage area.

TRI RINSE, INC.

1402 South Second St.
St. Louis, Missouri 63104
Telephone (314) 647-8338
FAX (314) 647-5028

Corrective Action: Air Horn was installed (11-12-2007) next to the spill kit at the entrance of the Hazardous Waste Storage Pad.

Citation: 40 CFR 265.35; 10 CSR 25-5.262 (1)

Description: Inadequate isle space around the hazardous waste containers in storage area.

Corrective Action: Rows were painted on the floor designating where drums can be placed or not. Secondly, the hazardous waste drum storage procedure was amended as well. (11-14-2007)

Citation: 40 CFR 265.52 (d); 10 CSR 25-5.262 (1)

Description: Contingency Plan does not include the addresses of the emergency coordinators.

Corrective action: Section 1.0 of the Emergency Hazardous Waste Management Plan, already included the addresses of emergency coordinators.

Citation: 40 CFR 265.52 (e); 10 CSR 25-5.262 (1)

Description: Contingency Plan does not include the location, physical description, and capabilities of emergency equipment

Corrective Action: Adding location and capabilities to the emergency equipment list in section 7.0 of the emergency hazardous waste management plan. (Will be completed by January 31, 2007)

Citation: RR0582

Description: One of four processing work orders did not include date of processing.

Corrective Action: All work orders now have a section for the date a material was processed. (11-9-2007)

If you have any questions or further concerns please contact the Environmental Health and Safety Director Clinton Shocklee at 314-647-8338.

Respectfully,

Clinton Shocklee
Tri-Rinse Inc.

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Tri Rinse, Inc.
Address: 1402 S. 2nd St.
St. Louis, MO 63104-4424
EPA ID Number: MO R000 505958 Date: 11/8/07

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<u>40 CFR 265.16(d)(3)</u> <u>10 CSR 25-5.262(1)</u>	<u>No written description of hazardous waste management training.</u>
<u>40 CFR 265.34</u> <u>10 CSR 25-5.262(1)</u>	<u>Inadequate access to an alarm or emergency communication device at the hazardous waste container storage area.</u>
<u>40 CFR 265.35</u> <u>10 CSR 25-5.262(1)</u>	<u>Inadequate aisle space around hazardous waste containers in the storage area.</u>
<u>40 CFR 265.52(d)</u> <u>10 CSR 25-5.262(1)</u>	<u>Contingency plan does not include the addresses of the emergency coordinators.</u>
<u>40 CFR 265.52(e)</u> <u>10 CSR 25-5.262(1)</u>	<u>Contingency plan does not include the location and physical description and capabilities of emergency equipment.</u>

You are requested to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

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David N. Whiting
922 Walnut St.
Iowa City, IA 52240
ATTN: _____

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(319) 887-2618, or Jim Aycock (Compliance Officer) at
(913) 551-7887.

This Notice prepared by David N. Whiting Date: 11/8/07

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.


Printed Name: Clinton Shacklee Date: 11-8-07
Signature: [Signature]
Title: EHSI

TO: Facility Name: Tri Rinse, Inc.
Address: 1402 S. 2nd St.
St. Louis, MO 63104-4424
EPA ID Number: MOR 000505958 Date: 11/8/7

RR 0582 Certification Approval item No. 5	One of four processing work orders did not include the date of processing.
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This Notice prepared by David N. Whiting Date: 11/8/07

Printed Name: Clinton Shacklee Date: 11-8-07
Signature: 
Title: FHSD

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name <i>Tri Rinse, Inc.</i>	
Facility Address <i>1402 S. 2nd St., St. Louis, MO 63104-4424</i>	
Inspector (print) <i>David M. Whiting</i>	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date <i>11/8/07</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <i>Clinton Shocklee</i>	Signature/Date <i>Clinton Shocklee 11/8/07</i>

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name <i>Tri Rinse, Inc.</i>
Facility Address <i>1402 S. 2nd St., St. Louis, MO 63104-4424</i>

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☒ Split Samples: YES ☐ NO ☐

Documents/Samples were: 1) Received no charge ☒ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$ Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- 1) *Emergency management plan (13 pages)*
- 2) *Manifests & one LDR notice for wastes shipped off-site (4 pages)*
- 3) *Two manifests for wastes shipped off-site from S200 Manchester (2 pages)*
- 4) *Manifests & processing work orders for hazardous waste received (8 pages)*
- 5) *Generator's hazardous waste summary report, excerpt (3 pages)*
- 6) *Facility summary report, excerpt (4 pages)*
- 7) *Closure certification for S200 Manchester - RR0573 (1 page)*
- 8) *NPDES permit (4 pages)*
- 9) *Safety-Kleen invoice (1 page)*

Facility Representative (print) <i>Clinton Shocklee</i>	Signature/Date <i>[Signature]</i> 11/8/07
Inspector (print) <i>David N. Whiting</i>	Signature/Date <i>[Signature]</i> 11/8/07
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101	

EMERGENCY HAZARDOUS WASTE MANAGEMENT PLAN

TRI-Rinse, Inc.
1400 Second Street
St. Louis, MO 63118
314-647-8338

1.0 Emergency Response Coordinators

The following list of TRI-Rinse, Inc., (Tri-Rinse) personnel are responsible for handling waste and coordinating any response to emergency events at the Tri-Rinse facility. They were selected due to their in-depth knowledge and understanding of operational procedures. These individuals will be on the premises or on call at all times and are qualified to act as Emergency Coordinators.

Clinton Shocklee - Primary Emergency Response Coordinator

Environmental Manager
13527 Sunset Ridge Lane
St Louis, MO 63128
Home 314-842-1321
Mobile 314- 223-9370
Office 314-647-8338 ext. 20

Michael Kamrath – Alternate Emergency Response Coordinator

Safety Coordinator
8306 Horst Road
St. Louis, MO 63127
Home 314-481-9623
Mobile 314-330-4336
Office 314-647-8338 ext. 26

Steve Ragaini – Alternate Emergency Response Coordinator

Plant Manager
1141 Monaco Lane
St Charles, MO 63303
Home 636-928-3319
Mobile 314-584-0340
Office 314-647-8338 ext. 30

Stephen Pizzitola – Alternate Emergency Response Coordinator
Production Manager
895 Fox Creek Rd.
Wildwood, MO 63069
Home 636-271-5668
Mobile 314-239-8187
Office 314-647-8338 ext. 27

2.0 Emergency Management Training

Following is a list of training given to employees involved with handling hazardous waste.

2.1 Initial Training

Initial training is conducted to review Tri-Rinse operations, hazardous materials and wastes, potential hazards, and emergency response procedures. This training includes:

- Facility and operations overview;
- Regulatory requirements;
- Hazardous materials and potential conditions;
- Emergency response equipment;
- Response procedures; and
- Post-incident requirements.

2.2 TRI-Rinse Drug Policy

Tri-Rinse has a strong commitment to provide a safe and secure work place and to establish programs promoting high standards of employee health. Thus, Tri-Rinse intends to provide a drug-free working environment. Employees are expected to be in suitable mental and physical condition at work, performing their jobs satisfactorily, and behaving appropriately.

Tri-Rinse will give the same consideration to persons with chemical dependency problems as it does to employees having other health problems. Seeking assistance for such a problem will not jeopardize an employee's job, whereas continued performance, attendance, or behavioral problems will jeopardize his/her job.

The possession, transfer, sale, or use of drugs while on Tri-Rinse premises or during working hours is prohibited. This includes all forms of narcotics, depressants, stimulants, hallucinogens, and marijuana. The services of any employee who engages in such conduct will be subject to disciplinary action, up to and including termination. The only exception to this policy is the

Tri-Rinse Inc.

taking of prescribed drugs under the direction of a physician. The unlawful involvement with drugs or narcotics off Tri-Rinse property will also constitute grounds for severe disciplinary action, up to and including termination of employment

2.3 Associated Safety Training

To ensure the safety of TRI-Rinse employees, the company provides them with proper procedures on the use and care of their company issued personnel protective equipment, including respirators. In the course of our business it is sometimes necessary to work in areas where employees must utilize respirators. Each employee is respirator fit tested annually by TRI-Rinse's Safety Coordinator.

Regular safety meetings are also given to review safety procedures, new equipment, operational instructions, and general company policies.

2.4 Hazardous Waste Operations and Emergency Response (HAZWOPER)

HAZWOPER training is given to selected employees whose job requires extended safety training.

This training is supplemented with periodic and refresher training as required.

3.0 Preparedness and Prevention

3.1 Program

The facility phone system is equipped with an intercom and P.A. system capable of internal and external communication. In addition, all key personnel are provided mobile phones with paging and radio capabilities.

Portable fire extinguishers are positioned throughout the facility, including production operations and material and waste storage areas.

Spill personnel protective equipment, absorbents, over pack drums, generators, air compressors, small tools, trucks, forklifts, trailers, and a skid steer loader are available for emergencies. This equipment is located within the production facility and maintenance shop.

Company policy mandates that all personnel working with hazardous materials and/or wastes operate under the "buddy" system.

3.2 Fire Prevention

1. Smoking is permitted only in areas designated by the Senior Management of TRI-Rinse, Inc.
2. All smoking materials shall be extinguished in ashtrays or designated receptacles.
3. Cigarette butts and ignition sources should not be disposed of in trashcans.
4. All extension cords, electrical cords should be examined on a routine basis to make sure that they are in good working condition. All frayed electrical cords should be noted and reported to management or maintenance personnel for replacement.
5. Heat producing equipment such as pots, ovens and portable heaters should be unplugged at the end of each workday.
6. Flammable and combustible substances should be stored away from ignition sources such as pilot lights, heat-radiating sources such as oven, or portable heaters. Lids and covers shall be placed on containers with flammable materials.
7. Good housekeeping is a prime importance in fire prevention. All unnecessary combustible materials such as boxes, paper, etc. should be removed from the plant area and disposed of properly. Combustibles such as pre-made boxes should be kept to a minimum.
8. Proper precautions should be taken when welding and burning.
9. Portable fire extinguisher can be used for small fires. Employees should familiarize themselves with the operation and location of fire extinguisher in their work areas. In most cases, fire extinguishers are operated by pulling a safety pin on the handle and aiming the nozzle at the base of the fire while squeezing the trigger.
10. If the fire cannot be managed by personnel with a fire extinguisher a management official should be told immediately so the appropriate action can be taken and the fire department notified.

3.3 Arrangements with Local authorities:

Tri-Rinse has contacted the City of St. Louis, District 2, Police Dept., and Fire Dept. and

provided tours of our facility.

Tri-Rinse provides remedial action to our clients and, therefore, can adequately handle emergency response at our own facility, which may be needed.

4.0 Contingency Plan and Emergency Procedures

Copies of this Contingency Plan are available at the office of the local police and fire departments.

4.1 Facility Description

The TRI-Rinse facility is located at 1400 South Second Street, St. Louis, MO. This facility operates as an office, warehouse, production unit, and maintenance shop. (See attached plot plan).

4.2 Emergency Response

When there is an imminent or actual emergency situation, the Emergency Coordinator (or his or her designee, when the Emergency Coordinator is on call) will immediately:

1. Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and
2. Notify appropriate state or local agencies with designated response roles if their action is needed.

Whenever there is a release, fire or explosion, the Emergency Coordinator will immediately identify the character, exact source, amount and spacial extent of any damage or spill, whether it is a chemical release, fire, explosion, or other damage. This will be done by observing or reviewing facility records and, if necessary, by chemical analysis.

Concurrently, the Emergency Coordinator will assess possible hazards to human health or the environment that may result from chemical release, fire or explosion. This assessment will consider both direct and indirect effects of the release, fire or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and/or heat-induced explosions.)

If the Emergency Coordinator determines that the facility has had a release, fire, or

Tri-Rinse Inc.

explosion that could threaten human health or the environment outside the facility, he or she will record the finding as follows:

1. If the assessment indicates that evacuation of local areas may be advisable, he or she will immediately notify appropriate local authorities and will be available to help appropriate officials decide which local areas should be evacuated; and
2. Either the government official designated as the On-Scene coordinator for the geographical area or the National Response Center (using their 24-hour toll free number 800-424-8802) will be immediately notified. This report must include:
 - a. the name and telephone number of the reporter;
 - b. the name and address of the facility;
 - c. the time and type of incident (e.g., release, fire);
 - d. the extent of injuries if any; and
 - e. the possible hazards to human health, or the environment, outside the facility.

During the emergency, the emergency coordinator will take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur or spread to other hazardous materials at the facility. These measures will include, where applicable, halting processes and operations, collecting and containing released waste, and removing or isolating containers.

If the facility stops operating in response to a fire, tornado, explosion or release, the Emergency Coordinator will monitor for leaks, pressure build-up, gas generation or ruptures in valves, pipes or other equipment wherever appropriate.

Immediately after an emergency, the Emergency Coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

The Emergency Coordinator will ensure that in the affected areas of the facility:

1. No waste that may be incompatible with the released material is treated, stored or disposed of until cleanup procedures are completed; and
2. All emergency equipment listed in the Contingency Plan is cleaned and

Tri-Rinse Inc.

fit for its intended use before operations are resumed.

TRI-Rinse will note in the operating record the time, date, and details of any incident that requires implementing the Contingency Plan. Within 15 days after the incident, a written report of the incident will be submitted to the Regional Administrator, as appropriate.

The report will include:

1. name, address and telephone number of the owner or operator;
2. name, address and telephone number of the facility;
3. date, time and type of incident (e.g., explosion);
4. name and quantity of material(s) involved;
5. the extent of injuries, if any;
6. an assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. estimated quantity and disposition of recovered material that resulted from the incident.

Oil used in equipment is stored in the facility's maintenance shop. Hazardous and non-hazardous waste is stored in a separate waste pad as shown on the attached plot plan.

The facility normally operates on an 8 hour, Monday through Friday work schedule with Saturday worked as needed.

Operations are under the supervision of the Operations Manager.

4.3 Organizational Structure:

The **Director, Environmental Management** has primary responsibility for implementing the Emergency Management Plan. He or she is the designated Primary Emergency Coordinator and is also responsible for coordinating training of employees.

The **Safety Coordinator** is a designated Alternate Emergency Coordinator and is responsible for overseeing company health and safety requirements, both during normal operations and in case of an emergency event.

The **Plant Manager** is a designated Alternate Emergency Coordinator and is responsible for overseeing facility operations and providing physical support during and emergency event.

Tri-Rinse Inc.

The **Production Manager** is a designated Alternate Emergency Coordinator and is responsible for informational and administrative support during an emergency event.

All personnel report to the President.

4.4 Security and Communications:

The facility, excluding the office, is surrounded by a chain link fence to restrict access to operations. Gates are locked during non-working hours. Security lighting is provided during non-daylight hours. The entire facility is protected by a security alarm system operated by an independent agency. Police and fire protection are supplied by the respective departments in the City of St. Louis.

The facility is equipped with a phone system which also has an internal telephone and P.A. system. Key personnel are also provided with phones equipped with paging and radio capabilities.

4.5 Material Compatibility:

All chemical materials are stored in containers compatible with the specific chemical. All containers conform with U.S. Department of Transportation (DOT) requirements and are labeled in conformance with applicable regulations.

4.6 Inspection and Maintenance:

All equipment and maintenance supplies are under daily visual observation. The designated waste storage pad is inspected at a minimum of one time per week. It is the Plant Manager's responsibility to have any leaking containers or damaged equipment repaired or replaced as soon as possible.

5.0 Emergency Control Procedure

5.1 Evacuation:

The alarm requiring plant evacuation will be a verbal page over the P.A. system.

On hearing the alarm, all employees shall progress swiftly yet safely to one of the five emergency exits as shown on the site plot plan.

All emergency exits are clearly marked with overhead signs.

Tri-Rinse Inc.

All employees will assemble on the west side of the TRI-Rinse main office for roll call.

Any personnel unaccounted for will be immediately reported to the Emergency Coordinator regarding their most recent known location.

Employees shall be given instructions as to the path of travel, hazards to avoid, and location to assemble.

5.2 Fire:

In case of fire in the production or maintenance facilities, the person first discovering the fire shall, depending on its size, try to contain the fire using fire extinguishers located in the building, and notify the Emergency Coordinator.

Depending upon the extent of the fire, evacuation of the site may be necessary. Under such circumstances, the Supervisor in charge, or his designee, shall order evacuation and contact the local fire department for assistance.

When the fire department is called, the Environmental Manager is to assure that someone meets the fire department to review potential hazards and direct them to the fire.

5.3 Spill:

Spills can range in magnitude from minor to major as defined below.

MINOR

A spill that **has not** gone beyond our equipment's control and have not entered sewer or storm drains.

MODERATE

A spill that has gone beyond our control equipment and has entered the sewer and/or storm drain.

MAJOR

A major spill that has entered the environment and/or flowed into the sewer and/or storm drain.

In the event a spill should occur, the person observing the spill will take immediate action

Tri-Rinse Inc.

(where it is safe to do so) to contain the spill. After taking such action, the person will then notify the Emergency Coordinator of the location and communicate the extent of the spill. Depending on the size and nature of the spill, the Emergency Coordinator will take appropriate action described below.

1. Assure that all personnel are evacuated from the affected area;
2. Confirm the nature and extent of the spill (minor, moderate, major);
3. Assure containment where practical;
4. Develop "field" action plan and notify local and state agencies, as appropriate;
5. Coordinate further containment and remedial action.

5.4 Vapor Release:

The likelihood of a vapor release resulting in toxic or choking vapors is remote. However, should the inadvertent mixing of incompatible chemical occur, such a release may result. If such a release occurs, the individual noting the release shall evacuate the warehouse in accordance with the evacuation procedures and notify the Emergency Coordinator. The Emergency Coordinator shall:

1. Assure that all personnel are accounted for;
2. Assess the situation in accordance with information provided by the individual(s) noting the release;
3. Immediately attend to any adversely affected personnel and call for outside medical support, as appropriate;
4. Develop a plan of action and notify surrounding property owners and local agencies as appropriate; and
5. Provide for the safe containment of the release;
6. Confirm an all-clear status before allowing personnel to return to the work area.

5.5 Injury:

In the case of direct contact with chemical, the skin shall be washed with water. Contaminated clothing removed. If eye contact occurs, the eyes shall be flushed with water. Medical attention shall follow as soon as possible. Material Safety Data Sheets are available for additional information.

Emergency showers will be strategically placed throughout the plant .

In case of physical injury, first aid shall be provided. Based on the seriousness of the accident, the supervisor shall decide whether hospital emergency attention is required

and, if so, the method of transporting the victim to the hospital.

5.6 Tornado:

The St. Louis metropolitan area is subject to potential tornado events. Consequently, this section has been incorporated to provide procedures for such occurrences.

1. The Emergency Coordinator will monitor the Weather Service for pertinent information and warning notices.
2. When a weather warning is received, the Intercom System will be used to convey the information to the employees.
3. Employees should go to interior hallways or along walls away from large windows. Protect head and face.
4. The "ALL CLEAR" signal will be given over the Intercom System.
5. If an emergency arises where the buildings at TRI-Rinse, Inc. need to be evacuated, the evacuation plan is as follows:
 - An evacuation order will be given over the Intercom System by a Senior Management official to all employees.
 - Designated employees will be instructed to shut down or disconnect all energy sources such as electricity, pneumatic sources of energy, natural gas supply and all other possible sources of energy.
 - All employees will exit in an orderly and calm manner from the premises.
 - The exit routes are posted on the maps. Maps illustrating the evacuation routes shall be posted in the supervisors' offices and by the time clock.
 - When the evacuation of the buildings is complete, ALL employees will assemble on the west side of the main office.
 - Supervisors will perform a head count of their departments. Any one not accounted for will be reported to the Fire Department personnel immediately regarding their most recent known location.

6.0 Emergency Response Contacts

6.1 Internal Contacts

Tri-Rinse has identified a primary Emergency Coordinator along with three alternates. These individuals have been selected based upon their knowledge, experience, and familiarity with Tri-Rinse Operations

Tri-Rinse Inc.

Clinton Shocklee - Primary Emergency Response Coordinator

Environmental Manager

13527 Sunset Ridge Lane

St Louis, MO 63128

Home 314-842-1321

Mobile 314- 223-9370

Office 314-647-8338 ext. 20

Michael Kamrath – Alternate Emergency Response Coordinator

Safety Coordinator

8306 Horst Road

St. Louis, MO 63127

Home 314-481-9623

Mobile 314-330-4336

Office 314-647-8338 ext. 26

Steve Ragaini – Alternate Emergency Response Coordinator

Plant Manager

1141 Monaco Lane

St. Charles, MO 63303

Home 636-928-3319

Mobile 314-584-0340

Office 314-647-8338 ext. 30

Stephen Pizzitola – Alternate Emergency Response Coordinator

Production Manager

895 Fox Creek Rd.

Wildwood, MO 63069

Home 636-271-5668

Mobile 314-239-8187

Office 314-647-8338 ext. 27

6.2 Fire Department

The Tri-Rinse facility is served by the St. Louis Fire Department with the closest station house located within two miles.

Phone: 911 or 314-289-1900

6.3 Other Outside Emergency Response Agencies

Additional external contacts are listed below.

MDNR	1-573-751-3176
Barnes/Heathline	314-531-5078
National Response Center	800-424-8802
2nd District Police	314-231-1212
2nd District Fire	314-289-1900
Metropolitan Sewer District	314-768-6260

7.0 EMERGENCY EQUIPMENT LIST

- A.B.C. Fire Extinguisher's
- Absorbent - i.e., Oil Dry, Pigs
- Over pack Drums
- Generators - 15KW, 75KW, 150KW, 250KW
- Air Compressors - 40CFM, 100CFM, 40 CFM
- Trucks - F3540 pickups, L8000 5 ton, tractor trailers, etc.
- Trailers - Dump and cargo vans
- Skid Steer, Yale Fork Lifts

- Misc. Hand Tools - i.e., Rakes, Shovels, and Brooms
- Southwestern Bell Telecom System with internal P.A. capabilities.
- Nextel cellular phones with paging and radio capabilities.

8.0 REPORTING:

Depending on the nature and extent of an emergency event, reporting may be required. It will be the responsibility of the Environmental Coordinator in conjunction with management to determine reporting requirements. In general, if:

- The accident posed or poses any potential threat to human health outside the facility, or
- A reportable quantity of a released material has entered the environment

The Emergency Coordinator will immediately notify the National Response Center (1-800-424-8802) and provide the following information:

1. The name, address, and U.S. EPA Identification Number of the Generator;
2. Date, time, and type of incident (i.e. spill or fire);
3. Quantity and type of hazardous waste involved in the incident;
4. Extent of injuries, if any; and
5. Estimated quantity and disposition of recovered materials, if any.

8.1 Incident Report

Following a hazardous materials incident, the Emergency Coordinator shall complete an incident report to include the following information.

Nature of Release: Fire, Explosion, Leakage

Type of Material: (i.e. solvent, ink, oil, solution, adhesive)

Location of Release:

Tri-Rinse Inc.

Volume of Release:

Extent of Release:(i.e. dimension of spill, extent of fire,etc.)

Assessment of Hazard: (i.e. volume of release, type of release, est.
wind speed and direction = net effect)

Emergency Action Taken:

Follow-Up Action Taken:

9.0 WEEKLY INSPECTION:

Facility hazardous waste activities are to be inspected on a weekly basis. A copy of the *Weekly Inspection Log* is included within the attached pages.